

Department of Justice	10-025	Special Domestic Violence Criminal Prosecution	To assist local governments in implementing the provisions of the Violence Against Women Act	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-026	OFFICE OF JUSTICE PROGRAMS and Evaluation Program	To provide technical assistance to state and local law enforcement agencies	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-027	National Child Support Enforcement Program	To provide technical assistance to state and local law enforcement agencies	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-028	Office of Violence Against Women Special Projects	To provide technical assistance to state and local law enforcement agencies	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-029	National Center on Restorative Justice	To provide technical assistance to state and local law enforcement agencies	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-031	Exempt Title Cops Crime Prevention Program	To provide technical assistance to state and local law enforcement agencies	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-032	Academic Studies and Field Testing and Policy Initiative	To provide technical assistance to state and local law enforcement agencies	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-034	Continued Emergency Supplemental Funding	The program is no longer funded. This was a one-time funding.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-035	Preventing Trafficking of Girls	The purpose of this program is to support the prevention and early intervention of child sex trafficking.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-036	Comprehensive Domestic Violence Court Program	The goal of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-037	Department of Justice Court System	The goal of the program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-038	National Domestic Violence Hotline	The purpose of the program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-039	Rural Women Crime Initiative	The goal of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-040	Matthew Shepard and James Byrd, Jr. Hate Crime Education	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-041	National Adult Court Network Training and Technical Assistance Program	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-042	Victims' Therapist Court Coordinator Grant Program	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-043	Domestic Violence Training and Technical Assistance Program	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-045	Community-based Violence Intervention and Prevention Initiative	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-046	Drug Court Research Center to Combat the Opioid Crisis	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-047	Community-based Violence Intervention and Prevention Initiative	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-048	Katie's Law and Hate Crime Act	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-049	Supporting Vulnerable and At-Risk Youth	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-050	Victims' Therapist Court Coordinator Grant Program	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-051	Victims' Therapist Court Coordinator Grant Program	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-052	Restorative Justice to Address Domestic Violence	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-053	Severe Assault Forensic Examination	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-054	Victim Rights Forensic Examination	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-055	Third Party Assault Forensic Examination	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-056	National Best Services Line	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-057	One-Stop Specific Services Program	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-058	Depositional Program on Trauma-Informed Practice	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-059	Third Party Assault Forensic Examination	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-060	Local Law Enforcement of Cybercrimes	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-061	National Research Center on Cybercrimes	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-062	Grants to State and Tribal Courts to Improve Protection of Victims of Domestic Violence	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-063	Produce Assistance to Victims of Domestic Violence	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-064	Severe Assault Forensic Examination	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-065	Training to Improve Responses to the Office of Justice Programs	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-066	Office of Justice Programs	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-067	Office of Justice Programs	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-123	Community-based Violence Prevention Program	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-301	Law Enforcement Assistance to Fill Advanced Police Training	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-302	Law Enforcement Assistance to Fill Police Training	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-303	Law Enforcement Assistance to Fill Program Implementation	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-304	Law Enforcement Assistance to Fill Crime Information	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-305	Law Enforcement Assistance to Fill Crime Report	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-307	Continued Data Entry System	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-308	Local Country Investigations	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>
Department of Justice	10-309	Law Enforcement Assistance to Fill Crime Report	The purpose of this program is to provide technical assistance to state and local law enforcement agencies.	<a href="https://www.sam.gov">https://www.sam.gov</a>

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Department of Justice	16.752	Economic, High-Tech, and Cyber Crime Prevention	Over the Economic, High-Tech, and Cyber Crime Prevention	report/https://www.justice.gov/economic-high-tech-and-cyber-crime-prevention
Department of Justice	16.753	Congressional Recommendation	To provide information regarding the functioning of the	report/https://www.justice.gov/congressional-recommendation
Department of Justice	16.754	Harold Rogers Prosecution Monitoring Program	To enhance the capacity of regulatory agencies to monitor and	report/https://www.justice.gov/harold-rogers-prosecution-monitoring-program
Department of Justice	16.756	Justice Department Special Counsel	To provide information regarding the functioning of the	report/https://www.justice.gov/justice-department-special-counsel
Department of Justice	16.757	Justice Training on Civil Matters for Court Personnel	To provide information regarding the functioning of the	report/https://www.justice.gov/justice-training-on-civil-matters-for-court-personnel
Department of Justice	16.758	Prosecution and Prevention of Crime	To provide information regarding the functioning of the	report/https://www.justice.gov/prosecution-and-prevention-of-crime
Department of Justice	16.812	Attorney General's Office	To provide information regarding the functioning of the	report/https://www.justice.gov/attorney-general-s-office
Department of Justice	16.813	NICS Act Program Improvement Program	To provide information regarding the functioning of the	report/https://www.justice.gov/nics-act-program-improvement-program
Department of Justice	16.815	Third Civil and Criminal Justice System	To provide information regarding the functioning of the	report/https://www.justice.gov/third-civil-and-criminal-justice-system
Department of Justice	16.816	Justice Department	To provide information regarding the functioning of the	report/https://www.justice.gov/justice-department
Department of Justice	16.817	Justice Department	To provide information regarding the functioning of the	report/https://www.justice.gov/justice-department
Department of Justice	16.818	Violence Against Women Act	To provide information regarding the functioning of the	report/https://www.justice.gov/violence-against-women-act
Department of Justice	16.820	Prosecution Training of Civil Evidence	To provide information regarding the functioning of the	report/https://www.justice.gov/prosecution-training-of-civil-evidence
Department of Justice	16.823	Emergency Planning and Response	To provide information regarding the functioning of the	report/https://www.justice.gov/emergency-planning-and-response
Department of Justice	16.824	Emergency Law Enforcement Assistance	To provide information regarding the functioning of the	report/https://www.justice.gov/emergency-law-enforcement-assistance
Department of Justice	16.825	State Protection Initiative	To provide information regarding the functioning of the	report/https://www.justice.gov/state-protection-initiative
Department of Justice	16.827	Justice Department Initiative	To provide information regarding the functioning of the	report/https://www.justice.gov/justice-department-initiative
Department of Justice	16.828	State, Federal, and FBI Supervision Program	To provide information regarding the functioning of the	report/https://www.justice.gov/state-federal-and-fbi-supervision-program
Department of Justice	16.830	State of the Justice System	To provide information regarding the functioning of the	report/https://www.justice.gov/state-of-the-justice-system
Department of Justice	16.831	Uniformity of Recidivism Rates	To provide information regarding the functioning of the	report/https://www.justice.gov/uniformity-of-recidivism-rates
Department of Justice	16.833	National Sexual Assault Initiative	To provide information regarding the functioning of the	report/https://www.justice.gov/national-sexual-assault-initiative
Department of Justice	16.834	Department Training Victim Program	To provide information regarding the functioning of the	report/https://www.justice.gov/department-training-victim-program
Department of Justice	16.835	State Police Criminal Justice and Implementation	To provide information regarding the functioning of the	report/https://www.justice.gov/state-police-criminal-justice-and-implementation
Department of Justice	16.836	Justice Department	To provide information regarding the functioning of the	report/https://www.justice.gov/justice-department
Department of Justice	16.838	Departmental Capital, Budget, and Other Matters	To provide information regarding the functioning of the	report/https://www.justice.gov/departmental-capital-budget-and-other-matters
Department of Justice	16.839	STOP Sexual Violence	To provide information regarding the functioning of the	report/https://www.justice.gov/stop-sexual-violence
Department of Justice	16.840	Keep Young Adults Safe	To provide information regarding the functioning of the	report/https://www.justice.gov/keep-young-adults-safe
Department of Justice	16.841	VOCA Model Victim Services Database Program	To provide information regarding the functioning of the	report/https://www.justice.gov/voca-model-victim-services-database-program
Department of Justice	16.842	Child Abuse Youth Initiative	To provide information regarding the functioning of the	report/https://www.justice.gov/child-abuse-youth-initiative
Department of Justice	16.844	Child Welfare Case in Progress	To provide information regarding the functioning of the	report/https://www.justice.gov/child-welfare-case-in-progress
Department of Justice	16.888	Consolidated and Technical Assistance	To provide information regarding the functioning of the	report/https://www.justice.gov/consolidated-and-technical-assistance
Department of Justice	16.889	State Program to Enhance the Quality of Life for Children and Services to Children	To provide information regarding the functioning of the	report/https://www.justice.gov/state-program-to-enhance-the-quality-of-life-for-children-and-services-to-children
Department of Justice	16.892	Equitable Sharing Program	To provide information regarding the functioning of the	report/https://www.justice.gov/equitable-sharing-program
Department of Labor	17.002	Labor Force Statistics	To provide information regarding the functioning of the	report/https://www.dol.gov/labor-force-statistics
Department of Labor	17.003	Payroll and Cost of Living Data	To provide information regarding the functioning of the	report/https://www.dol.gov/payroll-and-cost-of-living-data
Department of Labor	17.004	Productivity and Technology Data	To provide information regarding the functioning of the	report/https://www.dol.gov/productivity-and-technology-data
Department of Labor	17.005	Compensation and Working Conditions	To provide information regarding the functioning of the	report/https://www.dol.gov/compensation-and-working-conditions
Department of Labor	17.100	Employee Benefits Security Administration	To provide information regarding the functioning of the	report/https://www.dol.gov/employee-benefits-security-administration
Department of Labor	17.207	Department of Labor Worker-Repair Funded Activities	To provide information regarding the functioning of the	report/https://www.dol.gov/department-of-labor-worker-repair-funded-activities
Department of Labor	17.225	Unemployment Insurance	To provide information regarding the functioning of the	report/https://www.dol.gov/unemployment-insurance
Department of Labor	17.225	Senior Community Service Employment Program	To provide information regarding the functioning of the	report/https://www.dol.gov/senior-community-service-employment-program
Department of Labor	17.245	Trade Adjustment Assistance	To provide information regarding the functioning of the	report/https://www.dol.gov/trade-adjustment-assistance
Department of Labor	17.258	Workforce Development Program	To provide information regarding the functioning of the	report/https://www.dol.gov/workforce-development-program
Department of Labor	17.259	Workforce Development Program	To provide information regarding the functioning of the	report/https://www.dol.gov/workforce-development-program
Department of Labor	17.261	Workforce Development Program	To provide information regarding the functioning of the	report/https://www.dol.gov/workforce-development-program
Department of Labor	17.264	National Farmworker Labor Program	To provide information regarding the functioning of the	report/https://www.dol.gov/national-farmworker-labor-program
Department of Labor	17.265	National Farmworker Labor Program	To provide information regarding the functioning of the	report/https://www.dol.gov/national-farmworker-labor-program
Department of Labor	17.268	Adult Education and Training	To provide information regarding the functioning of the	report/https://www.dol.gov/adult-education-and-training
Department of Labor	17.270	Adult Education and Training	To provide information regarding the functioning of the	report/https://www.dol.gov/adult-education-and-training
Department of Labor	17.271	Work Opportunity Tax Credit Program	To provide information regarding the functioning of the	report/https://www.dol.gov/work-opportunity-tax-credit-program
Department of Labor	17.272	Work Opportunity Tax Credit Program	To provide information regarding the functioning of the	report/https://www.dol.gov/work-opportunity-tax-credit-program
Department of Labor	17.273	Work Opportunity Tax Credit Program	To provide information regarding the functioning of the	report/https://www.dol.gov/work-opportunity-tax-credit-program

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Department of State	19-205	Foreign Affairs Fellowship	Develop new information technology skills for the Department	https://state.gov/fellowship
Department of State	19-207	William D. Coolidge Fellowship	Develop new diplomatic skills for the Department	https://state.gov/fellowship
Department of State	19-209	Student Programs and Fellowships	Develop new diplomatic skills for the Department	https://state.gov/fellowship
Department of State	19-220	Arab League Special Staff Fellowship	Develop new diplomatic skills for the Department	https://state.gov/fellowship
Department of State	19-221	Regional Democracy Program	To support democracy and human rights in the Middle East region	https://state.gov/fellowship
Department of State	19-222	Trans-Saharan Governance Program	To support governance and human rights in the Sahel region	https://state.gov/fellowship
Department of State	19-223	South Sudan and ECHO Assistance Program	To support the South Sudan Assistance Program	https://state.gov/fellowship
Department of State	19-224	Humanitarian and Disarmament Fund	To support humanitarian and disarmament efforts	https://state.gov/fellowship
Department of State	19-225	Africa Regional Democracy Fund	To support democracy and human rights in Africa	https://state.gov/fellowship
Department of State	19-300	Program for Study of Eastern Europe and the Independent States of the former Soviet Union	To support the study of Eastern Europe and the Independent States of the former Soviet Union	https://state.gov/fellowship
Department of State	19-301	The Secretary's Office of the Global Partnership Initiative	To support the Secretary's Office of the Global Partnership Initiative	https://state.gov/fellowship
Department of State	19-303	Department of Technology Policy	To support the Department of Technology Policy	https://state.gov/fellowship
Department of State	19-322	Economic Structures	To support economic structures	https://state.gov/fellowship
Department of State	19-334	Office of the Biological Policy Staff	To support the Office of the Biological Policy Staff	https://state.gov/fellowship
Department of State	19-345	International Program to Support Democracy, Human Rights and the Rule of Law	To support international programs to support democracy, human rights and the rule of law	https://state.gov/fellowship
Department of State	19-355	International Program to Support the Freedom of Religion or Belief	To support international programs to support the freedom of religion or belief	https://state.gov/fellowship
Department of State	19-400	Academic Exchange Programs - Students	To support academic exchange programs for students	https://state.gov/fellowship
Department of State	19-401	Academic Exchange Programs - Scholars	To support academic exchange programs for scholars	https://state.gov/fellowship
Department of State	19-402	Professional and Cultural Exchange Programs - International	To support professional and cultural exchange programs for international participants	https://state.gov/fellowship
Department of State	19-403	Academic Exchange Programs - Teachers	To support academic exchange programs for teachers	https://state.gov/fellowship
Department of State	19-415	Professional and Cultural Exchange Programs - Other	To support professional and cultural exchange programs for other participants	https://state.gov/fellowship
Department of State	19-421	Academic Exchange Programs - Language	To support academic exchange programs for language participants	https://state.gov/fellowship
Department of State	19-440	Academic Exchange Programs - Educational Attaching and Student Exchange	To support academic exchange programs for educational attaching and student exchange participants	https://state.gov/fellowship
Department of State	19-441	ECU for American	To support the ECU for American	https://state.gov/fellowship
Department of State	19-450	ECU for American	To support the ECU for American	https://state.gov/fellowship
Department of State	19-451	Special International Exchange Grant	To support special international exchange grants	https://state.gov/fellowship
Department of State	19-452	International Exchange Alumni Programs	To support international exchange alumni programs	https://state.gov/fellowship
Department of State	19-500	Middle East Partnership Initiative	To support the Middle East Partnership Initiative	https://state.gov/fellowship
Department of State	19-501	Public Diplomacy Program for Afghanistan and the Middle East	To support public diplomacy programs for Afghanistan and the Middle East	https://state.gov/fellowship
Department of State	19-502	Middle East Regional Cooperation Program	To support middle east regional cooperation programs	https://state.gov/fellowship
Department of State	19-510	U.S. Refugee Admissions Program	To support the U.S. Refugee Admissions Program	https://state.gov/fellowship
Department of State	19-511	Overseas Refugee Assistance Program for East Asia	To support overseas refugee assistance programs for East Asia	https://state.gov/fellowship
Department of State	19-515	Contributions to International Organizations	To support contributions to international organizations	https://state.gov/fellowship
Department of State	19-517	Overseas Refugee Assistance Program for Africa	To support overseas refugee assistance programs for Africa	https://state.gov/fellowship
Department of State	19-518	Overseas Refugee Assistance Program for Western Hemisphere	To support overseas refugee assistance programs for the Western Hemisphere	https://state.gov/fellowship
Department of State	19-519	Overseas Refugee Assistance Program for Middle East and North Africa	To support overseas refugee assistance programs for the Middle East and North Africa	https://state.gov/fellowship
Department of State	19-520	Overseas Refugee Assistance Program for Europe	To support overseas refugee assistance programs for Europe	https://state.gov/fellowship
Department of State	19-522	Overseas Refugee Assistance Program for South Asia	To support overseas refugee assistance programs for South Asia	https://state.gov/fellowship
Department of State	19-523	Overseas Refugee Assistance Program for Southeast Asia	To support overseas refugee assistance programs for Southeast Asia	https://state.gov/fellowship
Department of State	19-600	Bureau of Near Eastern Affairs	To support the Bureau of Near Eastern Affairs	https://state.gov/fellowship
Department of State	19-601	Syria Assistance Program	To support the Syria Assistance Program	https://state.gov/fellowship
Department of State	19-602	RUSA Transparency Promotion Fund	To support the RUSA Transparency Promotion Fund	https://state.gov/fellowship
Department of State	19-603	Global Telecommunications	To support global telecommunications	https://state.gov/fellowship
Department of State	19-605	Global Telecommunications	To support global telecommunications	https://state.gov/fellowship
Department of State	19-666	Electronic National Democracy Grant	To support electronic national democracy grants	https://state.gov/fellowship
Department of State	19-701	Global Communication Programs	To support global communication programs	https://state.gov/fellowship
Department of State	19-703	Cultural Justice	To support cultural justice	https://state.gov/fellowship
Department of State	19-704	Cultural Justice	To support cultural justice	https://state.gov/fellowship
Department of State	19-705	Transnational Crime	To support transnational crime	https://state.gov/fellowship
Department of State	19-706	Partnership for Regional East Africa	To support the Partnership for Regional East Africa	https://state.gov/fellowship
Department of State	19-707	Assessment Operations to State Department	To support assessment operations to the State Department	https://state.gov/fellowship

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Department of the Interior	15-040	Administrative Cost Grants for Indian	To provide grants to BIA, DOI, and the U.S. Forest Service to support the Indian Self-Determination and Education Assistance Act.	https://nps.gov/	15-040
Department of the Interior	15-047	Indian Education Planning, Operations, and Maintenance	To provide grants to Indian tribes for the planning, operations, and maintenance of Indian education facilities.	https://nps.gov/	15-047
Department of the Interior	15-048	Business of Indian Affairs Education Operations and Maintenance	To provide grants to Indian tribes for the business of Indian affairs education operations and maintenance.	https://nps.gov/	15-048
Department of the Interior	15-051	Expanding Access to Indian Lands	To provide grants to Indian tribes for the expansion of access to Indian lands.	https://nps.gov/	15-051
Department of the Interior	15-052	Litigation Support for Indian Rights	To provide grants to Indian tribes for the support of litigation related to Indian rights.	https://nps.gov/	15-052
Department of the Interior	15-053	Attorney Fees Indian Rights	To provide grants to Indian tribes for the payment of attorney fees related to Indian rights.	https://nps.gov/	15-053
Department of the Interior	15-057	Language Indian Heritage	To provide grants to Indian tribes for the preservation and promotion of Indian language and heritage.	https://nps.gov/	15-057
Department of the Interior	15-058	Indian Tribal Technical Schools	To provide grants to Indian tribes for the operation and maintenance of Indian tribal technical schools.	https://nps.gov/	15-058
Department of the Interior	15-059	Indian Education Support Scholarship	To provide grants to Indian tribes for the support of Indian education support scholarship.	https://nps.gov/	15-059
Department of the Interior	15-060	Indian Vocational Training United States Technical Change	To provide grants to Indian tribes for the support of Indian vocational training and technical change.	https://nps.gov/	15-060
Department of the Interior	15-061	Indian Self-Determination United States Technical Change	To provide grants to Indian tribes for the support of Indian self-determination and technical change.	https://nps.gov/	15-061
Department of the Interior	15-062	Repatriation and Repair of Indian Cultural Resources	To provide grants to Indian tribes for the repatriation and repair of Indian cultural resources.	https://nps.gov/	15-062
Department of the Interior	15-063	Improvement and Repair of Indian Cultural Resources	To provide grants to Indian tribes for the improvement and repair of Indian cultural resources.	https://nps.gov/	15-063
Department of the Interior	15-065	Safety of Parks on Indian Lands	To provide grants to Indian tribes for the safety of parks on Indian lands.	https://nps.gov/	15-065
Department of the Interior	15-066	Tribal Child Labor Protection Initiative	To provide grants to Indian tribes for the tribal child labor protection initiative.	https://nps.gov/	15-066
Department of the Interior	15-067	Strengthening Tribal Nations	To provide grants to Indian tribes for the strengthening of tribal nations.	https://nps.gov/	15-067
Department of the Interior	15-068	Native Hawaiian Community Support	To provide grants to Native Hawaiian communities for the support of community development.	https://nps.gov/	15-068
Department of the Interior	15-069	Native Hawaiian Community Support	To provide grants to Native Hawaiian communities for the support of community development.	https://nps.gov/	15-069
Department of the Interior	15-070	Experiences Services Program	To provide grants to Indian tribes for the experiences services program.	https://nps.gov/	15-070
Department of the Interior	15-071	Public Access and Indian Lands	To provide grants to Indian tribes for the public access and Indian lands.	https://nps.gov/	15-071
Department of the Interior	15-072	USGS Expedition Services Program	To provide grants to Indian tribes for the USGS expedition services program.	https://nps.gov/	15-072
Department of the Interior	15-073	Earth Mapping Resource Initiative	To provide grants to Indian tribes for the earth mapping resource initiative.	https://nps.gov/	15-073
Department of the Interior	15-074	State Cultural Heritage and Groundwater Storage Project	To provide grants to Indian tribes for the state cultural heritage and groundwater storage project.	https://nps.gov/	15-074
Department of the Interior	15-075	Blackwater River Basin Settlement	To provide grants to Indian tribes for the blackwater river basin settlement.	https://nps.gov/	15-075
Department of the Interior	15-076	Mountain West Indian Lands Project	To provide grants to Indian tribes for the mountain west Indian lands project.	https://nps.gov/	15-076
Department of the Interior	15-077	Reclamation, Reconstruction, or Replacement of Cultural Resources	To provide grants to Indian tribes for the reclamation, reconstruction, or replacement of cultural resources.	https://nps.gov/	15-077
Department of the Interior	15-078	State Water Supply Forecasting	To provide grants to Indian tribes for the state water supply forecasting.	https://nps.gov/	15-078
Department of the Interior	15-079	Experiences Services Program (ESP)	To provide grants to Indian tribes for the experiences services program (ESP).	https://nps.gov/	15-079
Department of the Interior	15-080	Department of Interior Wildlife Management - Fisheries	To provide grants to Indian tribes for the department of interior wildlife management - fisheries.	https://nps.gov/	15-080
Department of the Interior	15-081	COY-100 Management Program	To provide grants to Indian tribes for the COY-100 management program.	https://nps.gov/	15-081
Department of the Interior	15-082	Native Hawaiian Community Support	To provide grants to Native Hawaiian communities for the support of community development.	https://nps.gov/	15-082
Department of the Interior	15-083	Assistance to Indian Tribes	To provide grants to Indian tribes for the assistance to Indian tribes.	https://nps.gov/	15-083
Department of the Interior	15-084	Indian Employment Assistance	To provide grants to Indian tribes for the Indian employment assistance.	https://nps.gov/	15-084
Department of the Interior	15-085	Indian Social Services Welfare Assistance	To provide grants to Indian tribes for the Indian social services welfare assistance.	https://nps.gov/	15-085
Department of the Interior	15-086	Indian Education Assistance to Schools	To provide grants to Indian tribes for the Indian education assistance to schools.	https://nps.gov/	15-086
Department of the Interior	15-087	Native American Business Development Initiative	To provide grants to Indian tribes for the native American business development initiative.	https://nps.gov/	15-087
Department of the Interior	15-088	Indian Health Assistance	To provide grants to Indian tribes for the Indian health assistance.	https://nps.gov/	15-088
Department of the Interior	15-089	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-089
Department of the Interior	15-090	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-090
Department of the Interior	15-091	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-091
Department of the Interior	15-092	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-092
Department of the Interior	15-093	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-093
Department of the Interior	15-094	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-094
Department of the Interior	15-095	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-095
Department of the Interior	15-096	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-096
Department of the Interior	15-097	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-097
Department of the Interior	15-098	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-098
Department of the Interior	15-099	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-099
Department of the Interior	15-100	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-100
Department of the Interior	15-101	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-101
Department of the Interior	15-102	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-102
Department of the Interior	15-103	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-103
Department of the Interior	15-104	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-104
Department of the Interior	15-105	Indian Child Welfare Act	To provide grants to Indian tribes for the Indian child welfare act.	https://nps.gov/	15-105

Department of the Interior	15-183	Trail Education Departments	Make grants and provide technical assistance to Tribes for	https://nps.gov/
Department of the Interior	15-184	Land Acquisition Planning Program	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-185	Trail Reconstruction Program	Reconstruct trails for the National Conservation System	https://nps.gov/
Department of the Interior	15-214	Non-Federal Lands	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-222	Cooperative Recreation Agreements with Tribes and States	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-224	Cultural and Paleontological Resources	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-225	Recreation and Visitor Services	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-228	BLM Field Management and Conservation	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-229	Wild Horse and Burro Resource Management	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-230	Recreation and Historic Park Management	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-232	Wild Fire Science Program	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-233	Forest and Rangeland Resource Management	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-234	Secure Public Lands and Community Self-Determination	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-235	Scenic Views and Public Lands Management	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-236	Environmental Quality and Protection	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-237	Rangeland Resource Management	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-239	Management Initiatives	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-241	Historic Preservation Act	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-243	Youth Conservation Corps	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-244	Adaptive Resource Management	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-245	Public Conservation and Recreation Management	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-246	Endangered and Threatened Species	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-247	Wildlife Resource Management	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-248	National Landscape Conservation System	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-250	Regulation of Surface Coal Mining	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-252	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-253	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-254	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-255	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-406	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-407	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-408	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-421	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-424	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-427	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-429	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-430	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-431	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-432	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-433	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-434	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-435	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-436	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-437	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-438	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-439	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-440	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-441	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-442	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-443	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/
Department of the Interior	15-444	Alaska National Monument	Acquire lands for the National Conservation System	https://nps.gov/

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Department of the Interior	15.574	Water Storage Enhancement	Section 4007 of Public Law 114-202, also known as the Water Storage Act, requires cooperative agreements for the purpose of water storage.	http://www.santagovern.org/
Department of the Interior	15.576	Yukon River Basin Water Enhancement Project in Yukon Basin	To provide funding for projects to improve water quality, riparian habitat, and fisheries management in the Yukon River Basin.	http://www.santagovern.org/
Department of the Interior	15.577	Coastal Watershed Supply Projects	To provide funding for projects to improve water quality, riparian habitat, and fisheries management in coastal watersheds.	http://www.santagovern.org/
Department of the Interior	15.580	Native Lands Acquisition Program	To provide funding for projects to acquire native lands for conservation purposes.	http://www.santagovern.org/
Department of the Interior	15.605	Sport Fish Restoration	To provide funding for projects to restore sport fish populations in watersheds.	http://www.santagovern.org/
Department of the Interior	15.608	Fish and aquatic Conservation, Aquatic Resource Species	To provide funding for projects to restore fish and aquatic resources in watersheds.	http://www.santagovern.org/
Department of the Interior	15.611	Watershed Restoration and Basin Habitat Education and Study	To provide funding for projects to restore watersheds and provide education and study on watershed health.	http://www.santagovern.org/
Department of the Interior	15.614	Coastal Watershed Planning, Protection and Restoration	To provide funding for projects to plan, protect, and restore coastal watersheds.	http://www.santagovern.org/
Department of the Interior	15.615	Cooperative Conservation Species Fund	To provide funding for projects to conserve cooperative conservation species.	http://www.santagovern.org/
Department of the Interior	15.616	Clean Vessel Act	To provide funding for projects to improve water quality by cleaning up boats and marinas.	http://www.santagovern.org/
Department of the Interior	15.619	Renewable and Tiger Conservation Fund	To provide funding for projects to conserve renewable resources and tigers.	http://www.santagovern.org/
Department of the Interior	15.620	Asian Elephant Conservation Fund	To provide funding for projects to conserve Asian elephants.	http://www.santagovern.org/
Department of the Interior	15.621	Asian Elephant Conservation Fund	To provide funding for projects to conserve Asian elephants.	http://www.santagovern.org/
Department of the Interior	15.622	Supporting and Scaling Healthy Act	To provide funding for projects to support and scale healthy watersheds.	http://www.santagovern.org/
Department of the Interior	15.623	North American Wetlands Conservation Fund	To provide funding for projects to conserve North American wetlands.	http://www.santagovern.org/
Department of the Interior	15.626	Enhanced Hunter Education and Safety	To provide funding for projects to enhance hunter education and safety.	http://www.santagovern.org/
Department of the Interior	15.628	Wildlife Conservation Fund	To provide funding for projects to conserve wildlife.	http://www.santagovern.org/
Department of the Interior	15.629	Great Age Conservation Fund - Alaska	To provide funding for projects to conserve Great Age species in Alaska.	http://www.santagovern.org/
Department of the Interior	15.630	Coastal	To provide funding for projects to conserve coastal resources.	http://www.santagovern.org/
Department of the Interior	15.631	Watershed for Fish and Wildlife	To provide funding for projects to conserve watersheds for fish and wildlife.	http://www.santagovern.org/
Department of the Interior	15.634	State Wildlife Grants	To provide funding for projects to conserve state wildlife.	http://www.santagovern.org/
Department of the Interior	15.635	Neotropical Migratory Bird Conservation	To provide funding for projects to conserve Neotropical migratory birds.	http://www.santagovern.org/
Department of the Interior	15.636	Alaska Subsistence Management	To provide funding for projects to manage Alaska subsistence resources.	http://www.santagovern.org/
Department of the Interior	15.637	Nguvay-Bid Joint Watershed	To provide funding for projects to conserve the Nguvay-Bid Joint Watershed.	http://www.santagovern.org/
Department of the Interior	15.639	Tribal Wildlife Grants	To provide funding for projects to conserve tribal wildlife.	http://www.santagovern.org/
Department of the Interior	15.640	Latin America and Caribbean Regional	To provide funding for projects to conserve Latin America and Caribbean resources.	http://www.santagovern.org/
Department of the Interior	15.643	Alaska Migratory Bird Conservation	To provide funding for projects to conserve Alaska migratory birds.	http://www.santagovern.org/
Department of the Interior	15.645	Marine Turtle Conservation Fund	To provide funding for projects to conserve marine turtles.	http://www.santagovern.org/
Department of the Interior	15.647	Nguvay-Bid Joint Watershed	To provide funding for projects to conserve the Nguvay-Bid Joint Watershed.	http://www.santagovern.org/
Department of the Interior	15.648	Central Valley Project Improvement Act (CVPIA)	To provide funding for projects to improve the Central Valley Project.	http://www.santagovern.org/
Department of the Interior	15.651	Central Africa Regional	To provide funding for projects to conserve Central Africa resources.	http://www.santagovern.org/
Department of the Interior	15.652	Wildlife Species	To provide funding for projects to conserve wildlife species.	http://www.santagovern.org/
Department of the Interior	15.653	Natural Character and Conservation	To provide funding for projects to conserve natural character and resources.	http://www.santagovern.org/
Department of the Interior	15.654	Natural Resource System Enhancement	To provide funding for projects to enhance natural resource systems.	http://www.santagovern.org/
Department of the Interior	15.655	Nguvay-Bid Joint Watershed	To provide funding for projects to conserve the Nguvay-Bid Joint Watershed.	http://www.santagovern.org/
Department of the Interior	15.657	Endangered Species Recovery	To provide funding for projects to recover endangered species.	http://www.santagovern.org/
Department of the Interior	15.658	Natural Resource Damage Assessment and Restoration	To provide funding for projects to assess and restore natural resource damage.	http://www.santagovern.org/
Department of the Interior	15.660	Candidate Species Conservation	To provide funding for projects to conserve candidate species.	http://www.santagovern.org/
Department of the Interior	15.661	Lower Basin Wetland Conservation Plan	To provide funding for projects to conserve Lower Basin wetlands.	http://www.santagovern.org/
Department of the Interior	15.662	Great Lakes Restoration	To provide funding for projects to restore the Great Lakes.	http://www.santagovern.org/
Department of the Interior	15.663	Native-Land Conservation Partnership	To provide funding for projects to conserve native lands.	http://www.santagovern.org/
Department of the Interior	15.664	Fish and Wildlife Conservation and Education	To provide funding for projects to conserve fish and wildlife and provide education.	http://www.santagovern.org/
Department of the Interior	15.665	Natural Resource System Enhancement	To provide funding for projects to enhance natural resource systems.	http://www.santagovern.org/
Department of the Interior	15.666	Endangered Species Conservation-Neotropical	To provide funding for projects to conserve Neotropical endangered species.	http://www.santagovern.org/
Department of the Interior	15.667	Nguvay-Bid Joint Watershed	To provide funding for projects to conserve the Nguvay-Bid Joint Watershed.	http://www.santagovern.org/
Department of the Interior	15.668	Coastal Wetland Assessment	To provide funding for projects to assess coastal wetlands.	http://www.santagovern.org/
Department of the Interior	15.669	Cooperative Landscape Conservation	To provide funding for projects to conserve cooperative landscapes.	http://www.santagovern.org/
Department of the Interior	15.670	Adaptive Science	To provide funding for projects to advance adaptive science.	http://www.santagovern.org/
Department of the Interior	15.671	Yukon River Salmon Research and Management	To provide funding for projects to research and manage Yukon River salmon.	http://www.santagovern.org/
Department of the Interior	15.674	Natural Resource System Enhancement	To provide funding for projects to enhance natural resource systems.	http://www.santagovern.org/
Department of the Interior	15.675	Coastal Wetland Assessment	To provide funding for projects to assess coastal wetlands.	http://www.santagovern.org/
Department of the Interior	15.677	Natural Resource System Enhancement	To provide funding for projects to enhance natural resource systems.	http://www.santagovern.org/

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## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

State of New York, et al.

(b) County of Residence of First Listed Plaintiff New York  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Rhode Island Office of Attorney General  
150 South Main Street, Providence, RI 02903

## DEFENDANTS

Donald Trump, et al.

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input checked="" type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
5 USC 702; 5 USC 706; 28 USC 2201Brief description of cause:  
APA, Constitutional Claims

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

Jan 28, 2025

SIGNATURE OF ATTORNEY OF RECORD

/s/ Sarah Rice

## FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.



Filed 01/28/25 Page 1 Page 2 Page 40#:

C.A. No. 1:25-cv-00039

**REQUEST FOR EMERGENCY  
TEMPORARY RESTRAINING  
ORDER UNDER FEDERAL RULE  
OF CIVIL PROCEDURE 65(B)**

DONALD TRUMP, IN HIS OFFICIAL CAPACITY AS PRESIDENT OF THE UNITED STATES; U.S. OFFICE OF MANAGEMENT AND BUDGET; MATTHEW J. VAETH, IN HIS OFFICIAL CAPACITY AS ACTING DIRECTOR OF THE U.S. OFFICE OF MANAGEMENT AND BUDGET; U.S. DEPARTMENT OF THE TREASURY; SCOTT BESSENT, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE TREASURY; PATRICIA COLLINS IN HER OFFICIAL CAPACITY AS TREASURER OF THE U.S.; U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES; DOROTHY A. FINK, M.D., IN HER OFFICIAL CAPACITY AS ACTING SECRETARY OF HEALTH AND HUMAN SERVICES; U.S. DEPARTMENT OF EDUCATION; DENISE CARTER, IN HER OFFICIAL CAPACITY AS ACTING SECRETARY OF EDUCATION; U.S. FEDERAL EMERGENCY MANAGEMENT AGENCY; CAMERON HAMILTON, IN HIS OFFICIAL CAPACITY AS ACTING ADMINISTRATOR OF THE U.S. FEDERAL EMERGENCY MANAGEMENT

AGENCY; U.S. DEPARTMENT OF  
TRANSPORTATION; JUDITH KALETA, IN HER OFFICIAL  
CAPACITY AS ACTING SECRETARY OF  
TRANSPORTATION; U.S. DEPARTMENT OF LABOR; VINCE  
MICONE, IN HIS OFFICIAL CAPACITY AS  
ACTING SECRETARY OF LABOR; U.S.  
DEPARTMENT OF ENERGY; INGRID KOLB, IN  
HER OFFICIAL CAPACITY AS ACTING  
SECRETARY OF THE U.S. DEPARTMENT OF  
ENERGY; U.S. ENVIRONMENTAL  
PROTECTION AGENCY; JAMES PAYNE, IN HIS  
OFFICIAL CAPACITY AS ACTING  
ADMINISTRATOR OF THE U.S.  
ENVIRONMENTAL PROTECTION AGENCY;  
U.S. DEPARTMENT OF HOMELAND  
SECURITY; KRISTI NOEM, IN HER CAPACITY  
AS SECRETARY OF THE U.S. DEPARTMENT  
OF HOMELAND SECURITY; U.S.  
DEPARTMENT OF JUSTICE; JAMES R.  
McHENRY III, IN HIS OFFICIAL CAPACITY AS  
ACTING ATTORNEY GENERAL OF THE U.S.  
DEPARTMENT OF JUSTICE; THE NATIONAL  
SCIENCE FOUNDATION and DR.  
SETHURAMAN PANCHANATHAN, IN HIS  
CAPACITY AS DIRECTOR OF THE NATIONAL  
SCIENCE FOUNDATION,

Defendants.

**MOTION FOR A TEMPORARY RESTRAINING ORDER**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff States move for issuance of an order temporarily restraining Defendants from enforcing the directive given to all Federal agencies in the Office of Management and Budget’s January 27, 2025 Directive to “**temporarily pause** all activities related to obligation or disbursement of all Federal financial assistance, and other relevant agency activities that may be implicated by [certain] executive orders” pending the Court’s review of the merits. Matthew J. Vaeth, Acting Director of the Office of Management and

Budget, “Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs” (January 27, 2025) (“OMB Directive”), at 2.

The OMB Directive’s directive to “pause . . . disbursement of Federal funds under all open awards,” and to “pause” other Federal financial assistance-related activities is unlawful under the Administrative Procedure Act (“APA”) because it is arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law, contrary to constitutional right or power, in excess of statutory jurisdiction, authority, or limitations, and is contrary to law. *See* 5 U.S.C. § 706. The OMB Directive also violates constitutional Separation of Powers principles and exceeds the constitutional limitations on any Spending Clause power that Congress might have delegated to the executive branch in any of the activity areas affected by the “pause.” The OMB Directive’s “pause” mandate is causing Plaintiff States immediate and irreparable harm—in the form of millions of dollars in obligated funds and mass regulatory chaos—every day that the policy set out in the OMB Directive is in effect.<sup>1</sup> The balance of the equities also weighs overwhelmingly in Plaintiffs’ favor. Plaintiff States thus respectfully request that this Court schedule a hearing on this matter today, January 28, 2025, or as soon as is otherwise practicable, and that the Court restrain the Defendants from enforcing the OMB Directive’s directive to “pause all activities related to obligation or disbursement of all Federal financial assistance.” OMB Directive at 2.

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<sup>1</sup> Indeed, Defendants essentially acknowledged in a separate filing that a TRO would be appropriate if payments under particular grant programs have been delayed and that such delay would cause harm meriting immediate relief—which this record, with declarations from dozens of state officials indicating just that—amply demonstrates. Def.’s Notice Regarding Pls’ Mot. for TRO, *Nat’l Council of Nonprofits v. OMB*, No. 25-cv-239 Dkt. 11 at 2 (D.D.C. Jan. 28, 2025).

## BACKGROUND

Last night, Plaintiff States became aware through social media reporting, later confirmed by the Washington Post,<sup>2</sup> that the Acting Director of the Office of Management and Budget, Matthew Vaeth, had sent a sweeping Directive to heads of executive departments and agencies that will upend the regular workings of State government programs providing health care, safe roads, disaster assistance, and other essential services. The OMB Directive has already caused mass uncertainty and confusion for recipients of Federal funds who are not sure when or if they will receive funding already obligated. The OMB Directive addresses “Federal financial assistance,” a broad designation under Federal law that encompasses most Federal grants and loans—the Directive itself claims that \$3 trillion of FY 2024 Federal government spending is comprised of Federal financial assistance. OMB Directive, at 1.

Complicating matters further, instead of communicating through normal procedural channels to explain changes in the complex Federal grant and loan programs each Federal executive branch agency is charged with administering, Director Vaeth issued the OMB Directive as a non-publicized internal memorandum dictating that all agencies “**must temporarily pause** all activities related to obligation or disbursement of all Federal financial assistance . . . .” *Id.* at 2. The memorandum further cryptically explains that the financial activities subject to the pause include, but are not limited to, “financial assistance for foreign aid, nongovernmental organizations, DEI, woke gender ideology, and the green new deal.” *Id.* And, while the OMB Directive specifically mentions seven executive orders that by their own terms purport to limit

<sup>2</sup> Jeff Stein, Jacob Bogage, and Emily Davies, “White House pauses all federal grants, sparking confusion,” Washington Post, Jan. 27, 2025, <https://www.washingtonpost.com/business/2025/01/27/white-house-pauses-federal-grants/>.



Federal financial assistance or at least appear to begin a process at interrupting Federal financial assistance,<sup>3</sup> it is unclear if these are the only policies to which the memo applies. *Id.* at 1-2.

The OMB Directive sketches out a process by which each executive branch agency “must complete a comprehensive analysis” of their programs, the purpose of which is to allow the Administration to “review agency programs and determine the best uses of the funding for those programs consistent with the law and the President’s priorities.” *Id.* at 2. But, while that happens, the Directive asserts that “all activities related to obligation or disbursement of all Federal financial assistance” must be paused. *Id.* at 2. And while the order describes the pause as temporary, there is no set end date. Agencies must submit a detailed report by February 10, 2025, but there is no deadline for OMB to make a determination and resume funding. *Id.* While waiting for that determination to be made, “[e]ach agency must pause: (i) issuance of new awards; (ii) disbursement of Federal funds under all open awards; and (iii) other relevant agency actions that may be implicated by the executive orders, to the extent permissible by law . . . .” *Id.*

State Plaintiffs rely on Federal financial assistance to provide basic services to their residents. In FY 2024, Federal grants to States surpassed \$1 trillion.<sup>4</sup>

Billions of dollars flow to State health systems, infrastructure, law enforcement, education, and everything in between. Many States are faced with the possibility of immediate cash shortfalls

<sup>3</sup> The referenced executive orders are: *Protecting the American People Against Invasion* (Jan. 20, 2025), *Reevaluating and Realigning United States Foreign Aid* (Jan. 20, 2025), *Putting America First in International Environmental Agreements* (Jan. 20, 2025), *Unleashing American Energy* (Jan. 20, 2025), *Ending Radical and Wasteful Government DEI Programs and Preferencing* (Jan. 20, 2025), *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (Jan. 20, 2025), and *Enforcing the Hyde Amendment* (Jan. 24, 2025). Id. at 1-2.

<sup>4</sup> Rebecca Thiess, Kate Watkins, and Justin Theal, “Record Federal Grants to States Keep Federal Share of State Budgets High,” Pew, Sept. 10, 2024, <https://www.pewtrusts.org/en/research-and-analysis/articles/2024/09/10/record-federal-grants-to-states-keep-federal-share-of-state-budgets-high>.

to conduct their basic everyday programs like funding for healthcare and food for children, which are and have been conducted through cooperative federalism arrangements enacted by Congress and in place for decades, and to address their most pressing emergency needs. *See* Affirmation of Keith D. Hoffman dated January 28, 2025 (“Hoffmann Aff.”) at ¶¶3-31 (citing exhibits A-DD in support); Compl. ¶¶ 77-97. This will result in immediate and devastating consequences for the people of Plaintiff States. California is in particularly dire straits given the uncertainty imposed by the Department of Justice Memorandum on continued disbursement of Federal Emergency Management Agency (“FEMA”) funding that is essential to the response to wildfires. Compl. ¶80. Many of these grants are distributed according to statutory formulas such that Congress did not leave discretion to agencies to determine qualification to begin with.

In short, funding making up billions of dollars in each of Plaintiff States has been cast aside regardless of the chaos this will cause or the impact on essential functions Americans need in their daily lives.

## ARGUMENT

The legal standard for a temporary restraining order “mirrors that for a preliminary injunction.” *Schnitzer Steel Industries, Inc. v. Dingman*, 639 F. Supp. 3d 222, 226 (D.R.I. 2022) (citing *Harris v. Wall*, 217 F. Supp. 3d 541, 552 (D.R.I. 2016)). Under that standard, “[t]he district court must consider ‘the movant’s likelihood of success on the merits; whether and to what extent the movant will suffer irreparable harm in the absence of preliminary injunctive relief; the balance of relative hardships [and equities]; and the effect, if any, that either a preliminary injunction or the absence of one will have on the public interest.’” *U.S. Ghost Adventures, LLC v. Miss Lizzie’s Coffee LLC*, 121 F.4th 339, 347 (1st Cir. 2024) (quoting *Ryan v. U.S. Immigration and Customs Enforcement*, 974 F.3d 9, 18 (1st Cir. 2020)); *see Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S.

7, 20 (2008). The final two factors—the balance of equities and the public interest—“merge when the Government is the opposing party.” *Nken v. Holder*, 556 U.S. 418, 435 (2009). “Likelihood of success is the main bearing wall of the four-factor framework.” *Ross-Simons of Warwick, Inc. v. Baccarat, Inc.*, 102 F.3d 12, 16 (1st Cir. 1996). However, a “district court is required only to make an estimation of likelihood of success and need not predict the eventual outcome on the merits with absolute assurance.” *Schnitzer Steel Industries, Inc.*, 639 F. Supp. 3d at 226 (quoting *Corp. Techs., Inc. v. Harnett*, 731 F.3d 6, 10 (1st Cir. 2013)).

# **I. Plaintiff States Have Standing to Challenge the OMB Directive.**

Plaintiff States risk losing billions of dollars of funding obligated to them by the Federal government, and for this reason, they easily meet the standard for Article III standing.

“To ensure the proper adversarial presentation *Lujan* holds that a litigant must demonstrate that it has suffered a concrete and particularized injury that is either actual or imminent, that the injury is fairly traceable to the defendant, and that it is likely that a favorable decision will redress that injury.” *Massachusetts v. EPA*, 549 U.S. 497, 517 (2007) (citing *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560–61 (1992)). “Monetary costs are of course an injury.” *United States v. Texas*, 599 U.S. 670, 676 (2023). Thus, “los[ing] out on federal funds . . . is a sufficiently concrete and imminent injury to satisfy Article III.” *Dep’t of Com. v. New York*, 588 U.S. 752, 767 (2019).

Because the OMB Directive threatens to pause large amounts of Federal funding to the Plaintiff States on less than 24 hours’ notice, the Plaintiff States meet these requirements. The injury could hardly be more severe: Plaintiff California faces the prospect of losing disaster relief funds at a moment of great need, as the Los Angeles area is recovering from devastating wildfires; Plaintiff States risk losing funding that they receive from the Federal government to provide school lunches to children from low-income families, grants to help law enforcement combat violence

against children, elders, and other vulnerable populations, and funds for highways and other essential infrastructure. Compl. ¶¶ 14, 30, 82, 90. In short, each of the Plaintiff States faces immediate, direct pocketbook losses.

Moreover, because the OMB Directive was issued to agency heads on less than 24 hours' notice, the Plaintiff States have had no time to prepare for this drastic move by the Federal government. Had the proposal given several weeks' or months' notice, the Plaintiff States could have consulted with their budgetary personnel to devise a plan to address any potential pause in funding. Compl. ¶¶ 95-97. As it is, they had no notice and thus no ability to set aside funding for the anticipated shortfall, work with their legislatures to appropriate funds, or take other similar measures. *Id.*

The OMB Directive’s Federal financial assistance “pause” mandate is also causing a present harm to Plaintiff States’ ability to engage in budgeting and financial planning.

As for traceability and redressability, the Defendants are the sole cause of this mayhem—there is no other party that these injuries could be traced to. And the injunctive relief Plaintiff States seek will prevent the Federal government from following through on its unlawful directive.

## II. Plaintiff States Are Likely to Succeed on the Merits

Plaintiff States are likely to succeed on the merits of their claims. *First*, Defendants' actions violate the APA because they are acting *ultra vires*: Congress has not delegated any unilateral authority to Defendants to indefinitely pause all Federal financial assistance under any circumstance, irrespective of the specific Federal statutes and contractual terms governing particular grants, and without even considering those statutory and contractual terms. The OMB Directive's categorical and sweeping command cannot be squared with the complex statutory regime governing Federal grants and, specifically, the many Federal statutes requiring the Executive to provide grant funding to recipients under particular statutory provisions and formulas.



*Second*, the OMB Directive is arbitrary and capricious in multiple respects, including that it “entirely fail[s] to consider . . . important aspect[s] of the problem,” *Motor Vehicle Mfrs. Ass’n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983), namely the significant harms imposed on grant recipients (including Plaintiff States) by an abrupt termination of nearly all Federal funding. There is also a sweeping gulf between the purported basis for the OMB Directive (President Trump’s recent executive orders directing agencies to consider terminating programs in a handful of discrete policy areas) and what it actually does, which is to imperil billions of dollars in Federal funding without regard to what the funding supports, the statutory scheme authorizing it, or whether it has any connection to the recent executive orders. The OMB Directive also does not consider any alternatives—for instance, conducting its “review” absent a pause in Federal funds, or pausing only grants and other Federal financial assistance where it has some power to act.

Moreover, by purporting to terminate Federal funds on 24 hours’ notice, the OMB Directive effectively renders illusory (1) its direction that funding be halted only “to the extent permissible by law” and (2) its statement that “OMB may grant exceptions allowing Federal agencies to issue new awards or take other actions on a case-by-case basis.” The OMB Directive provides no time for Federal agencies either to make supported requests for case-by-case exceptions to the memo’s directives or to assess adequately whether halting particular grants would or would not be permissible under law. Even with more time, it is unclear whether it would be possible to assess whether the law permits any funding to be halted in response the President’s Executive Orders where the Executive Orders themselves may be contrary to law.

Indeed, the OMB Directive does not identify *any* reasoned explanation for the decision to halt all Federal funding to grant recipients, across the board and indefinitely, much less one that

could justify such an extreme and reckless policy. And Defendants are not even attempting to clearly limit the spending “pause” to only some subset of Federal financial assistance as to which they determine that they have lawful authority to order the pause, because the pause is mandated to take effect at 5:00 p.m. on the day after it was issued and actually began even sooner—this morning. Defendants are thus acting with full knowledge that, as to many of the funding disbursements it is pausing indefinitely, the Executive has no lawful authority to hold back the funding, because Congress has tied its hands or because the terms of the grants—which States reviewed and accepted—do not authorize any such pause.

*Third*, implementing the OMB Directive Federal funding freeze will violate separation of powers principles. “The United States Constitution exclusively grants the power of the purse to Congress, not the President,” *City & Cnty. of San Francisco v. Trump*, 897 F.3d 1225, 1231 (9th Cir. 2018), with the executive branch possessing only such authority in relation to Federal funding that Congress has chosen to give it. Congress has not given the Executive limitless power to “pause” all Federal financial assistance—including funds that Congress has expressly directed to specific recipients and purposes—while the Executive tries to figure out where it might have some authority to renege on its funding commitments, let alone to pause all Federal financial assistance indefinitely.

*Fourth*, even if the Executive had some power to suspend disbursements in some areas affected by the OMB Directive’s instruction, it still would not have power to retroactively impose a new term on already agreed upon Federal financial assistance to Plaintiff States—the new term being that the Executive retains a right to pause already-awarded funding midstream, indefinitely, while it decides whether or not it still wants to fund the grant-funded activities. Plaintiff States are entitled to know the terms of the funding agreement *before* they enter into it. Plaintiff States are



not currently aware of grant terms that would allow an indefinite, unsubstantiated, across-the-board freeze of all funds—let alone the type of clear terms that would be required to put the States on notice, before they accepted the many Federal grants implicated by the OMB Directive, that these Federal funds could be frozen based solely on the Executive’s unilateral whims. And to the extent the OMB Directive is attaching new, retroactive conditions on Federal funding recipients’ receipt of Federal funds—or pausing Federal funding so it can decide whether to try to impose such new conditions—it is plainly in violation of the limitations on any spending power it might have.

Plaintiff States are thus highly likely to succeed on their claims that the OMB Directive is arbitrary and capricious and contrary to law, that agencies halting all disbursement of Federal funds pursuant to the OMB Directive are acting *ultra vires*, and that the executive branch—and the President—are violating separation of powers principles.

#### **A. The OMB Directive Is Contrary to Law and *Ultra Vires* (Count I)**

It is black-letter law that, in the appropriations context, “the President must follow statutory mandates so long as there is appropriated money available.” *In re Aiken Cnty.*, 725 F.3d 255, 259 (D.C. Cir. 2013) (Kavanaugh, J.); *accord, e.g., City & Cnty. of San Francisco*, 897 F.3d at 1232 (“[T]he President is without authority to thwart congressional will by canceling appropriations passed by Congress.”).<sup>5</sup> The Executive cannot simply “decline to follow a statutory mandate or prohibition simply because of policy objections.” *Aiken Cnty.*, 725 F.3d at 259. But the OMB

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<sup>5</sup> The OMB Directive constitutes final agency action subject to the APA. Final agency actions “mark the consummation of the agency’s decisionmaking process” and are those “by which rights or obligations have been determined, or from which legal consequences will flow.” *Bennett v. Spear*, 520 U.S. 154, 177-78 (1997) (internal citation and quotation marks omitted). The OMB Directive is a final agency action because it is a final order directing all agencies to immediately “pause all activities related to obligation or disbursement of all Federal financial assistance.” OMB Directive, at 2.

Directive purports to do just that, instructing agencies to “pause” trillions of dollars in Federal funding that Congress has directed the executive branch to spend—and, in many cases, that the agencies have formally obligated to grant recipients under specific terms—simply because such funds are not, in its view, “align[ed] . . . with the will of the American people as expressed through Presidential priorities.” OMB Directive, at 1.

The OMB Directive identifies no legal authority for such an action, and there is none: no Federal law authorizes the President to unilaterally halt all disbursements of all Federal funds to all funding recipients, no matter the authorizing or appropriating statute, the regulatory regime, or the terms and conditions of the grant itself. *See Aiken Cnty.*, 725 F.3d at 261 n.1 (explaining that the executive branch and its officers, including the President, do “not have unilateral authority to refuse to spend” funds that have been appropriated by Congress “for a particular project or program”). To the contrary, when the President wants “to spend less than the full amount appropriated by Congress” he must comport with the specific procedural requirements set forth in the Impoundment Control Act, 2 U.S.C. §§ 681 *et seq.*; *see also Aiken Cnty.*, 725 F.3d at 261 n.1, citing 2 U.S.C. § 683 (requiring budget authority proposed for rescission to be made available for obligation until “Congress has completed action on a rescission bill[.]”). Even a temporary “pause” of budget authority by the OMB requires compliance with the ICA. 2 U.S.C. § 684 (requiring proposed deferrals to be transmitted via a “special message” to Congress).

Indeed, Federal appropriations law is complex and nuanced, and it cannot be squared with the OMB Directive’s reckless sweep. Many of the most significant funding streams to the States, for instance, take the form of categorical or “formula” grants, which Congress has instructed the Executive to provide to States on the basis of enumerated statutory factors, such as population or the expenditure of qualifying State funds. *See, e.g., City of Los Angeles v. Barr*, 941 F.3d 931, 934-

35 (9th Cir. 2019) (describing the statutory factors determining eligibility for specific formula grant); *City of Philadelphia v. Att’y Gen. of United States*, 916 F.3d 276, 280 (3d Cir. 2019) (same). Congress, for instance, has instructed the Department of Education to fund elementary and secondary education in the States by reference to specific formulas that encompass total population and the population of disadvantaged children, among other factors. 20 U.S.C. § 6303; see Rebecca R. Skinner, Cong. Rsch. Serv., R47702, *ESEA Title I-A Formulas: A Primer* (2023), available at <http://bit.ly/4ha5W52>. But the funding statute does not confer authority on the Department (or anyone else) to indefinitely halt elementary and secondary education grants to the States simply because such grants are not “align[ed] . . . with the will of the American people,” OMB Directive, at 1, as the OMB Directive instructs it to do.

The same is true of many other Federal funds that Congress has required the Executive to provide to the States (and other grantees), but which the OMB Directive purports to indefinitely suspend. Congress has required the Secretary of Health and Human Services to reimburse States for a fixed portion of their Medicaid expenditures, 42 U.S.C. § 1396b(a) (outlining that the HHS Secretary “shall pay to each State” amount set by statute), an amount totaling over \$800 billion annually, U.S. Dep’t of Health & Human Servs., Centers for Medicare & Medicaid Servs., *NHE Fact Sheet*, <https://bit.ly/42xCy4i> (last updated Dec. 18, 2024). But Congress did not authorize the Acting Secretary to indefinitely suspend such payments “simply because of policy objections,” *Aiken Cnty.*, 725 F.3d at 259, as the OMB Directive instructs. Likewise, Congress has established a statutory formula by which the Secretary of Transportation is required to distribute Federal highway funds to States, 23 U.S.C. § 104(c), an amount totaling approximately \$60 billion annually, U.S. Dep’t of Transp., Fed. Highway Admin., *State-by-State Federal Aid Highway Program Apportionments*, available at <https://bit.ly/3WBmpXC>. But Congress did not authorize

the Acting Secretary to indefinitely halt the distribution of highway funds to States on the view that such funds do not “advanc[e] Administration priorities,” as the OMB Directive so instructs. At bottom, the OMB Directive appears to suggest that the Executive can unilaterally suspend the payment of Federal funds to the States at any time simply by choosing to do so, no matter the authorizing or appropriating statute, the regulatory regime, or the terms and conditions of the grant itself. That is not the law.

## **B. The OMB Directive Is Arbitrary and Capricious (Count II)**

Plaintiff States are also highly likely to succeed on their claim that the OMB Directive is arbitrary and capricious in multiple respects.

First, the OMB Directive is arbitrary and capricious on its face because it “entirely fail[s] to consider . . . important aspect[s] of the problem,” *State Farm*, 463 U.S. at 43, principally the profound harms worked on the States and their residents by the abrupt halt in Federal funding and the significant reliance interests that States have developed in connection with the Federal funds to which they are entitled by law. It is a basic rule of administrative law that an agency must “pay[] attention to the advantages *and* the disadvantages of [its] decisions.” *Michigan v. EPA*, 576 U.S. 743, 753 (2015). But the OMB Directive reflects no consideration of the extraordinary harm that its policy will impose on the States and their residents. The OMB Directive threatens Plaintiff States’ ability to perform these essential activities—and it does so without any evidence that it considered the enormous costs of its abrupt policy change. Because Defendants “should have considered those matters but did not,” their “failure was arbitrary and capricious in violation of the APA.” *Dep’t of Homeland Sec. v. Regents of the Univ. of Cal.*, 591 U.S. 1, 33 (2020).

Likewise, the OMB Directive does not reflect any consideration of the “serious reliance interests” that Plaintiff States and their residents have developed on the Federal funds to which they were legally entitled, and the consequences of withdrawing those funds with little or no notice.